



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

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EPA Region 5 Records Ctr.



204071

MEMORANDUM

REPLY TO THE ATTENTION OF

SE-5J

DATE: JUL 03 2003

SUBJECT: ACTION MEMORANDUM - Request for Approval of Funding In The Amount of \$598,032 for a Time Critical Removal Action at the Lennon Wallpaper Site, Joliet, Will County, Illinois (B5W1)

FROM: Michael D. Harris, On-Scene Coordinator
Emergency Response Section 2

TO: William E. Muno, Director
Superfund Division

THRU: Richard Karl, Chief
Emergency Response Branch
Site ID#: B5W1

I. PURPOSE

The purpose of this memorandum is to request approval to expend up to \$598,032 to abate an imminent and substantial threat to public health and the environment present at the Lennon Wallpaper Site, Joliet, Will County, Illinois (Site) (41° 31.1583' north latitude and 88° 03.6138' west longitude). This action is necessary to mitigate the immediate threat to public health and the environment posed by the presence of uncontrolled hazardous substances on Site, including soils containing lead.

The response action proposed herein will mitigate Site conditions by removal and off-site disposal of the contaminated soil. The high levels of lead in surface soil at concentrations considered hazardous, the Site's proximity to residential and business properties require that this action be classified as a time critical removal. The project will require an estimated 30 working days to complete.

There are no nationally significant or precedent setting issues associated with the Lennon Wallpaper Site. The Lennon Wallpaper Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID # ILD984799759

A. Site Description

1. Site history

The Lennon Wallpaper facility began operations at the site in 1919. The facility covered about 12 acres. In 1954, the Lennon family sold most of the company to William Strickland, who then sold a portion of the company to Walter Mueller in 1966. In 1981, the company's assets were sold to Thomas Industries, which was bought out by North American Decorative Products in 1988. The Lennon Wallpaper facility ceased operations in 1989. Since the closure of the facility, parcels of the site property have been sold. These parcels are currently used for storage of wood debris, cinder blocks, and other landscaping materials. Previous environmental investigations have been conducted on all seven parcels of the site property.

2. Physical location

The Lennon Wallpaper site consists of seven parcels covering about 12 acres of land near 807 4th Avenue in Joliet, Will County, Illinois. The site is in the Southwest 1/4 of the Northwest 1/4 of Section 14, Township 35 North, Range 10 East of the Third Principal Meridian in Will County. The geographic coordinates of the site are 41° 31.1583' north latitude and 88° 03.6138' west longitude. Adjacent to the site are private residences to the north and west and an abandoned rock quarry to the south. The area of interest for the site assessment is an open, un-vegetated area in the northwest portion of the site.

The un-vegetated assessment area is located near Parcel 5 on the east side of Boulder Avenue. Parcel 5 is completely surrounded by a chain-link fence; however, there are some large holes in the fence. Parcel 5 is bordered on the north by a wetland, on the west by railroad tracks, on the south by Grant Avenue (vacant), and on the east by Preston Place (vacant).

According to the Region 5 Superfund Environmental Justice Analysis, the group of residents closest to the Site reside in census tract #8824, block group #2. This block group has a total population of 1559. Of the 1559, 70% are classified as minority. Approximately 50% of the families residing in this block group have an income of less than the established state low income level. The demographic conditions indicate an environmental justice priority for the community around this Site.

3. Removal Site evaluation

On July 24, 2001 at 9:00 am, U.S. EPA OSC Walter Nied and START members Lee Christenson and Jodi McCarty arrived at the Lennon Wallpaper site to conduct a removal evaluation. To evaluate whether the site posed a threat to human health or the environment from contaminated soil, START conducted soil sampling. A total of 12 samples were collected from 10 locations in the un-vegetated area in the northwest portion of the site property. The sampling locations were selected by START and OSC Nied and are shown in Figure 2.

The 10 sampling locations were sequentially numbered LW-1 through LW-10. Of the 12 samples collected, 2 samples were collected from location LW-1, 1 sample and 1 duplicate sample were collected from location LW-6, and 1 sample was collected from each of the remaining eight locations. The soil samples were collected from a distinct layer of clay-like material that covered the entire un-vegetated area. The material was generally pinkish-grey in color, contained a glittering substance, and exhibited multicolored layers. The material extended to about 2 feet below ground surface (bgs), where dark brown, organic silts and sands were encountered. Samples were collected at varying depths between the ground surface and the material's interface with native silts and sands at about 2 feet bgs. For the purposes of the site assessment, samples were collected using a hand auger and were homogenized with gloved hands in stainless-steel bowls. After sample collection, each sampling location was marked with an orange flag. All sampling equipment was decontaminated between sampling locations.

When sample collection had been completed, START wrapped the samples in bubble-wrap, placed them in a cooler on ice, and shipped them for overnight delivery to Suburban Laboratories (Suburban) in Hillside, Illinois. The sample analytical parameters are discussed in Section 3.2.

On July 26, 2001, at 8:45 am, OSC Nied and START member Lee Christenson returned to the Lennon Wallpaper site in order to identify all the sampling locations using a global positioning system (GPS) unit. In addition, Suburban had notified START on July 25, 2001 that the sample containers for locations LW-8 and LW-10 had been broken during shipment. As a result, START re-sampled these locations on July 26, 2001 and shipped the two new samples for overnight delivery to Suburban. After sample shipment, Suburban informed START that Suburban had misplaced three site samples: LW-6, LW-6D (duplicate), and LW-7.

On March 29, 2002, at 8:40 am, U.S. EPA OSC Sonia Vega and START members Lee Christenson and Annie Pestro visited the Lennon Wallpaper site. The purposes of the visit were (1) to collect soil samples to replace those misplaced by Suburban and (2) to collect additional soil samples outside the un-vegetated area in order to further delineate the extent of the contamination at the site. OSC Vega and START had planned to collect replacement samples LW-6, LW-6D, and LW-7 as well as additional samples LW-11, LW-12, LW-13, and LW-14.

When OSC Vega and START arrived at the site, they found that the entire north end of the site was under water, including locations LW-6 and LW-7. Because of site conditions, the three replacement samples as well as one additional sample planned for collection at the north end of

the site were not collected. However, samples LW-11, LW-12, LW-13, and LW-13D were collected from the south, west, and east perimeters of the site, respectively. The samples were collected using the same procedures and at the same depths as during the first sampling event. The samples were collected approximately 10 feet outside the un-vegetated area to the south and east. In samples LW-11 and LW-12, the same clay-like material was present as was found in the un-vegetated area of the site, indicating that contamination extends beyond the un-vegetated area. The clay-like material was not present in samples LW-13 and LW-13D. After sample collection, the four samples were placed in a cooler on ice and were hand-delivered to Severn Trent Laboratories (STL) in University Park, Illinois.

B. State and Local Authorities' Role

1. State and Local actions to date

After the Lennon Wallpaper facility ceased operations in 1989, the Illinois Environmental Protection Agency (ILEPA) collected sediment and soil samples throughout the site in 1990 to determine the environmental impacts of the former operations. Sample analytical results indicated high concentrations of contamination (primarily metals) at the site. Based on this information, in April 1990 ILEPA issued a 4(q) notice to all potentially responsible parties (PRP) to conduct a remedial investigation and feasibility study (RI/FS) for the site. The PRPs took insufficient action to satisfy the conditions of the 4(q) notice. The Lennon Wallpaper site was placed in the Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) in 1991.

Following a screening site inspection in 1992, ILEPA decided to conduct an Expanded Site Inspection (ESI) in May 95. During the ESI, soil samples were collected from 13 locations throughout the abandoned facility and on neighboring residential properties. Samples were collected from the 0- to 6-inch bgs interval and were analyzed for Target Compound List (TCL) parameters. Sample analytical results from the ESI indicated the presence of elevated concentrations of inorganic contamination in soil on the site property.

In April 2000, ILEPA conducted a site characterization and used an x-ray fluorescence (XRF) spectrum analyzer to screen soil at 61 locations throughout the site property. Samples collected from 0 to 2.5 feet bgs were screened for inorganic contamination. The XRF spectrum analyzer indicated the presence of elevated concentrations of inorganics. Lead concentrations were particularly elevated, with one result as high as 59.955 parts per million (ppm).

Through a letter dated November 16, 2000, ILEPA requested that the Emergency Response Branch (ERB) conduct a time critical removal assessment at the Lennon Wallpaper Site.

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Lennon Wallpaper Site present an imminent and substantial threat to the public health, or welfare, and the environment and meet the criteria for a removal action provided for in the National Contingency Plan (NCP), Section 300.415, Paragraph (b)(2). 40 C.F.R. § 300.415(b)(2)(I), (iii) and (v), respectively, specifically allows removal actions for:

- 1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants:

The Site is located in a residential area. The accessibility of the Site provides the potential for exposure by nearby population or animals. The health concerns at this Site are related to the uncontrolled access to the property and the evidence of trespassing on the property by the local population, potentially exposing young children, pregnant women and elderly individuals to elevated levels of lead contamination.

The effects of lead exposure are more severe for young children and the developing fetus through exposure to a pregnant woman. The harmful effects of lead included premature births, lower birth weight, decreased mental ability in the infant, learning difficulties, and reduced growth in young children. In adults, lead increases blood pressure, induces anemia as a result of the inhibition of hemoglobin synthesis, decreases reaction time, affects memory, and damages the male reproductive system. Lead is also considered by U.S. EPA to be a class B2 or probable human carcinogen. Toxicity information is summarized in the references, ATSDR, 1993 and U.S. EPA, 2000.

- 2) Hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate or pose a threat of release:

The elevated concentrations of lead in the soils at the surface pose a threat of migration of contaminated materials due to rain or melting snow. There is also the possibility of airborne migration of lead dust particles. People and animals contacting contaminated areas could track contaminants to other areas on-site as well as off-site.

Concentrations of TCLP lead detected in SB-118 (0 to 3 ft) and in surface samples SS-107 and SS-118 exhibited characteristics of hazardous waste. These sampling locations contain concentrations of TCLP lead above the 5.0 mg/L regulatory limit defined in 40 CFR Part 266, Appendix VII (2001).

- 3) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released:

ILEPA and U.S. EPA have documented that high levels of lead exists on the ground surface and

down to a 3 ft depth. Heavy rains may cause further migration of contaminants off site. Winds could cause dust particles containing heavy metals to migrate into the surrounding community. These weather conditions could result in a continued release of lead described herein to the surrounding soil and air.

- 4) The availability of other appropriate federal or state response mechanisms to respond to the release.

ILEPA asked the U.S. EPA - Region 5, ERB to proceed with a time-critical removal action at the Lennon Wallpaper Site. The State of Illinois does not have the funds to undertake removal of the elevated lead found at this Site.

IV. ENDANGERMENT DETERMINATION

Given the conditions at the Lennon Wallpaper Site, the nature of the hazardous substances on Site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following actions to mitigate threats posed by the presence of hazardous wastes at the Lennon Wallpaper Site:

- 1) Develop and implement a Site Health and Safety Plan, including an air monitoring plan and Site contingency plan;
- 2) Develop and implement a Site security plan;
- 3) Characterize, remove and properly dispose of hazardous substance and wastes (contaminated soils) located at the Site in accordance with U.S. EPA's Off-Site Rule (40 CFR 300.440);
- 4) Backfill the excavated areas with clean material and topsoil. Restore and vegetate to prevent soil erosion;

The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.41 5(I) of the NCP. The nature of this removal action, as well as the complete removal of all hazardous wastes from the Site, will eliminate the need for any post removal Site control.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 30 working days to complete.

EXTRAMURAL COSTS:

<u>Regional Removal Allowance Costs:</u>	\$438.360
Total Clean-up Contractor Costs	
<u>Other Extramural Costs Not Funded from the Regional Allowance:</u>	
Total START, including multiplier costs	\$ 60.000
Subtotal, Extramural Costs	\$498.360
Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	\$ <u>99,672</u>
TOTAL. REMOVAL ACTION PROJECT CEILING	\$598.032

The response actions described in this memorandum directly address the actual or threatened release at the Site of a hazardous substance, or of a pollutant, or of a contaminant which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable, relevant, and appropriate requirements (ARARs) will be complied with to the extent practical. A letter was sent to Bruce Everetts of the Illinois EPA on February 25, 2003 requesting that the Illinois EPA identify State ARARs. Any State or Federal ARARs identified in a timely manner for this removal action will be complied with to the extent practical.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Continued risk to public health and the environment will result if no action or delayed action ensues.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in an Enforcement Confidential Addendum (see Attachment B).

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$894,191.96.¹

$$(\$598,032 + 30,000) + (42.38\% \times \$628,032) = \$894,191.96$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Lennon Wallpaper Site, Joliet, Will County, Illinois, developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site (see Attachment C). Conditions at the Site meet the criteria of the NCP, 40 C.F.R. § 300.415 (b)(2) for a removal action, and I recommend your approval of the proposed removal action. The total estimated project ceiling, if approved, will be \$598,032. Of this, an estimated \$438,360 may be used for cleanup contractor costs. You may indicate your decision by signing below:

APPROVE : Wm E. Myer DATE: 7/3/03
Superfund Division Director

DISAPPROVE: _____ DATE: _____
Superfund Division Director

Attachments:

- A. Detailed Cleanup Contractor Estimate
- B. Enforcement Confidential Addendum
- C. Administrative Record Index
- D. Environmental Justice Analysis

¹Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

cc: R. Worley, U.S. EPA HQ, 5202G
M. Chezik, U.S. Department of Interior, **w/o Enf. Addendum**
B. Everetts, IL EPA, **w/o Enf. Addendum**
R. Cipriano, IL EPA, **w/o Enf. Addendum**
S. Davis, IL DNR, **w/o Enf. Addendum**

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(REDACTED 1 PAGE)

Attachment A

DETAILED CLEANUP CONTRACTOR ESTIMATE LENNON WALLPAPER SITE JOLIET, WILL COUNTY, ILLINOIS JUNE 2003

The estimated cleanup contractor costs necessary to complete the removal action at the Lennon Wallpaper Site are as follows:

Personnel	\$ 64,448.00
Equipment	59,952.80
Subcontractors and Materials	126,919.20
Transportation and Disposal	<u>187,040.00</u>
 TOTAL	 \$438,360.00

ENFORCEMENT ADDENDUM

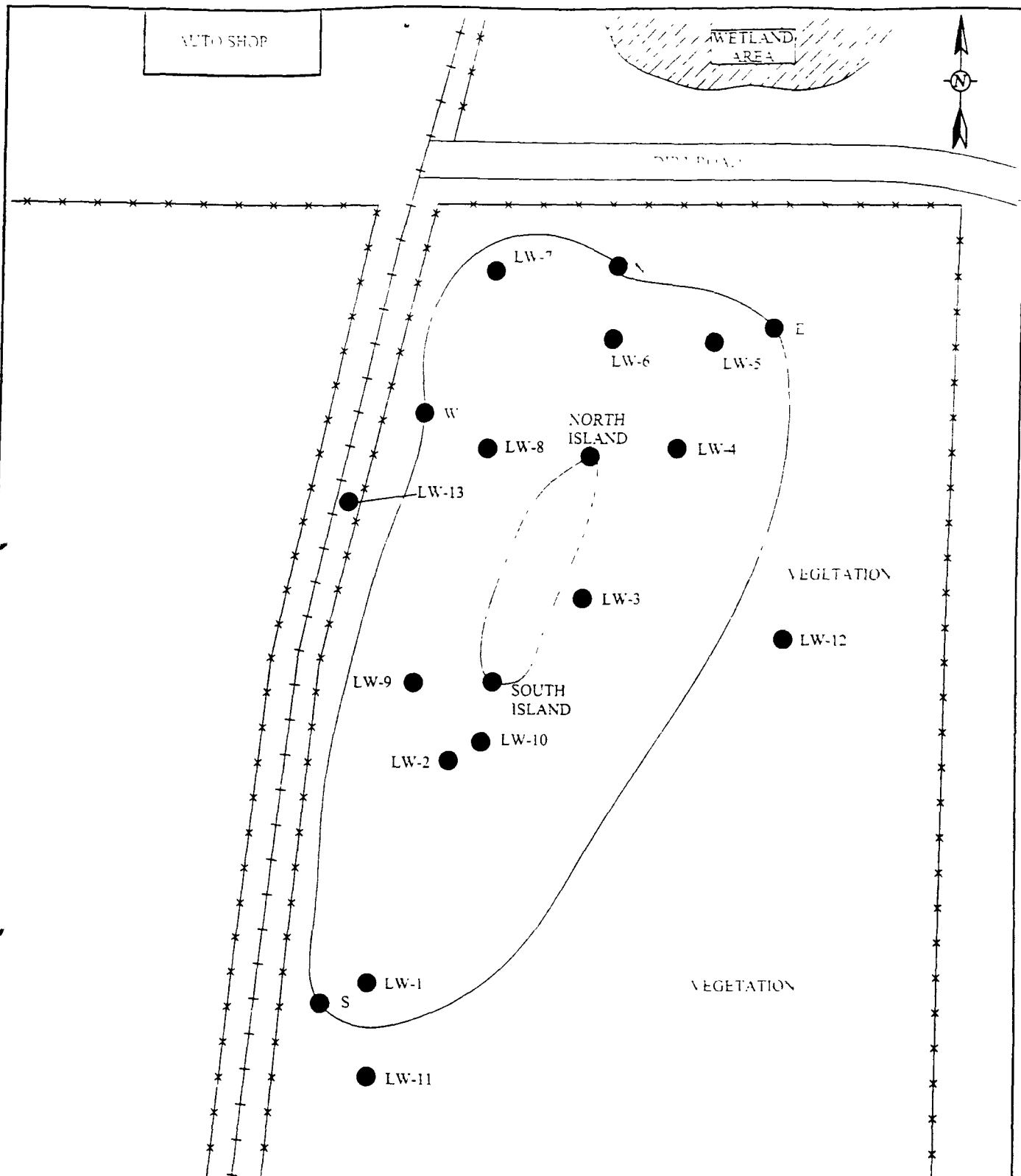
LENNON WALLPAPER SITE
JOLIET, WILL COUNTY, ILLINOIS

JUNE 2003

ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY

(REDACTED 2 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION



LEGEND

- VEGETATION AREA
- UNVEGETATED AREA
- EXISTING STRUCTURE
- SAMPLES COLLECTED JULY 24, 2001
- SAMPLES COLLECTED MARCH 29, 2002
- REMOVAL AREA DELINEATION POINTS
- ▨ SURFACE WATER
- ×× FENCE
- ++ RAILROAD TRACKS
- DIRT ROAD

0 20 40
SCALE IN FEET

LENNON WALLPAPER
JOLIET, ILLINOIS

FIGURE 2
SITE LAYOUT AND
SAMPLING LOCATION MAP



TETRA TECH EM INC.

ATTACHMENT C

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION
ADMINISTRATIVE RECORD
FOR
LENNON WALLPAPER SITE
JOLIET, WILL COUNTY, ILLINOIS

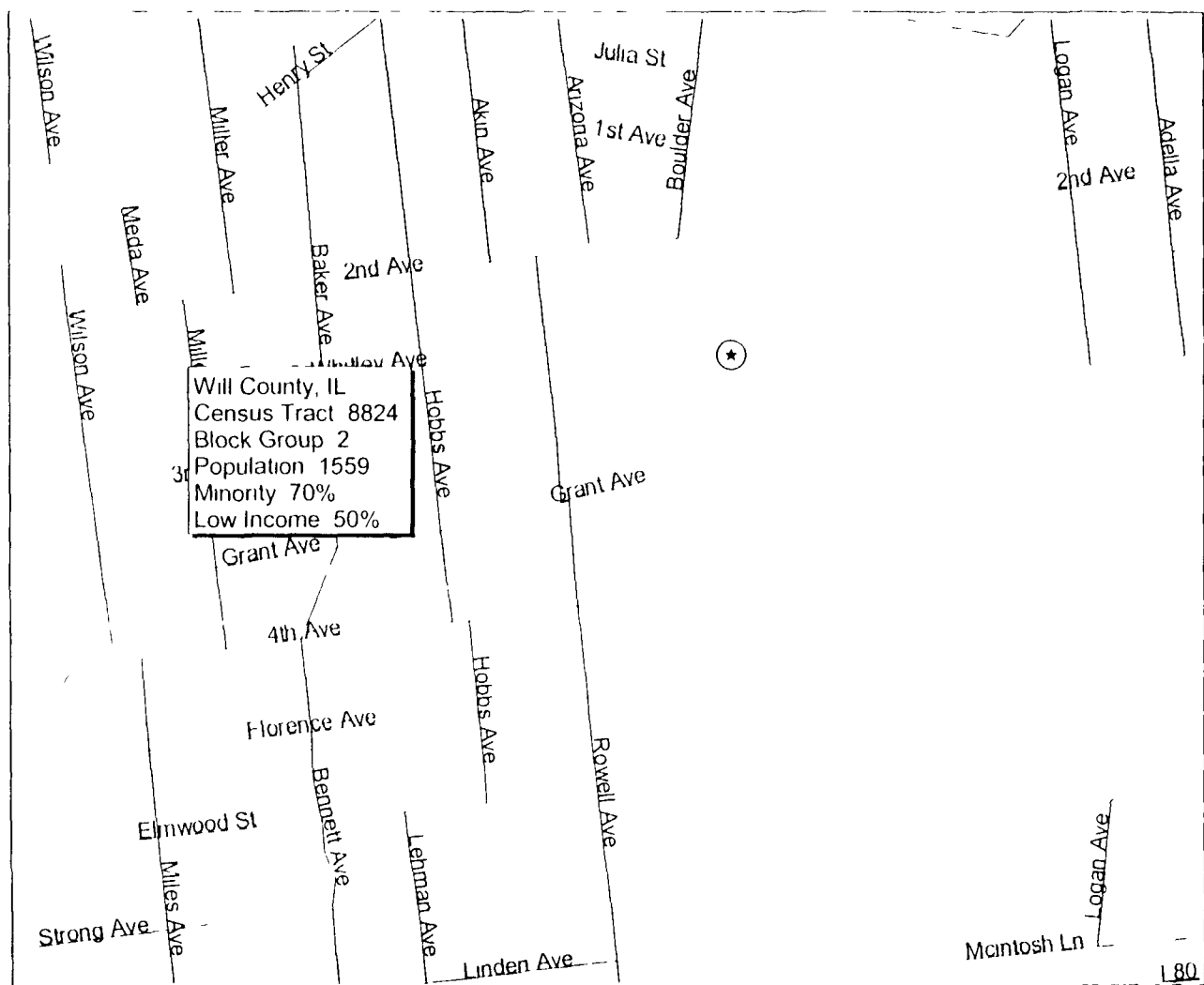
ORIGINAL
JUNE 17, 2003

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	11/16/00	Everetts, B., IL EPA	Bolen, B., U.S. EPA	Letter re: IL EPA's Request for U.S. EPA Assistance at the Lennon Wallpaper Site w/Attachments	-
2	08/00/02	IL EPA	U.S. EPA	CERCLA Expanded Site Inspection Report (Volume 1) for the Lennon Wallpaper Site	51
3	09/04/02	Tetra Tech EM, Inc.	U.S. EPA	Removal Action Plan for the Lennon Wallpaper Site	18
4	00/00/00	Harris, M., U.S. EPA	Muno, W., U.S. EPA	Action Memorandum: Request for Approval of Funding for a Time Critical Removal Action at the Lennon Wallpaper Site (PENDING)	

Region 5 Superfund EJ Analysis

Lennon Wallpaper Site

Joliet, IL



State of Illinois averages:

Minority: 25%

Low Income: 27%

U.S. EPA Region 5
Environmental Justice Case Criteria
for State of Illinois

Minority: 50% or greater

Low Income: 54% or greater

★ Site Location



0 0.2 0.4 0.6 0.8 Miles

Date of Map: 1/13

U.S. EPA Region 5
Environmental Justice Case Criteria
for State of Illinois